



## Land and Chemicals Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☒ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action  
☐ Return to Compliance  
☐ Other Correspondence- NOD, memo to ORC

Facility Name: Conesville Generating Station

City: Conesville State: OH

U.S. EPA ID#: 04D000816686

Assigned Staff: Derrick Samaranski Phone: 312-886-7812

Name	Signature	Date
Author	<i>Derrick Samaranski</i>	12/17/10
Regional Counsel	<i>concurrency by email</i>	01/31/11
Section Chief	<i>R. L. Helle</i>	2-2-11
Branch Chief		

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

*Once the certified mail receipt is returned:*

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Conesville Generating Station  
47201 CR 273  
Conesville, Ohio 43811

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) **WILLIAM C. PHILLABAUM** B. Date of Delivery **2-11-11**

C. Signature **X** *William C. Phillabaum* ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. **7001 0320 0006 1468 2264**

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 07 2011

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7001 0320 0006 1468 2264**  
**RETURN RECEIPT REQUESTED**

LR-8J

**IN THE MATTER OF:**

Conesville Generating Station  
47201 CR 273  
Conesville, Ohio 43811

U.S. EPA ID No.: OHD000816686

**ATTENTION:** Mr. Brain Scragg, Registered Agent

**REQUEST FOR INFORMATION**

By this letter, the United States Environmental Protection Agency (U.S. EPA) requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of U.S. EPA to require you to submit certain information.

This Request for Information requires Conesville Generating Station (or "you") to submit certain information relating to its operations located at 47201 CR 273, Conesville, Ohio. We are requiring this information for purposes of enforcing RCRA and its implementing regulations. Attachment 2 specifies the information you must submit. You must submit this information within 21 calendar days of receiving this request to the United States Environmental Protection Agency, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604, Attention: Derrick Samaranski.

You may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You must make any request for confidentiality at the time you submit the information to U.S. EPA, since any information not so identified may be made available to the public without further notice.

Conesville Generating Station must submit all requested information under an authorized signature certifying that the information is true, accurate and complete to the best of the

## Attachment 1

### Instructions:

1. You must provide a complete and separate response to each of the questions or requests in Attachment II. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
2. In preparing your response to each question, consult with all present and former employees and agents of the facility who may be familiar with the matter to which the question pertains.
3. In answering each question, identify all contributing sources of information.
4. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and phone number and the reasons for your belief.
5. If you cannot provide a precise answer to any question, please approximate and state the reason for your inability to be specific.
6. If anything is deleted or redacted from a document produced in response to this Request for Information, state the reason for and the subject matter of the deletion.

If a document is requested but is not available, state the reason for its unavailability. In addition, identify any such document by author, date, subject matter, number of pages, and all recipients and their addresses.

## **Attachment 2**

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which the answer corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which the document responds.

### **Requests**

1. Identify each and every person consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.

### **Combustion Boiler Clean-Outs**

2. Provide the following information for each **water-side** cleaning event of the combustion boilers conducted at the Conesville Generating Station plant in the past five years ending at 08/11/2010:
  - a) the date(s) the cleaning occurred,
  - b) identify the combustion boiler unit(s) cleaned,
  - c) describe the cleaning procedure including volumes of liquids, names of chemicals, and length of cleaning,
  - d) copies of the MSDS sheets of the chemical agents used during the cleaning.
3. Provide the following information for each waste stream(s) generated during each boiler cleaning event described in 2 above:
  - a) chemical composition of the waste stream,
  - b) copies of TCLP results of the waste stream prior to any on-site or off-site treatment,
  - c) amount of each waste generated in gallons or pounds,
  - d) describe on-site units (ex. containers, tanks) used to accumulate the waste including type of construction materials and volume,
  - e) copies of any hazardous waste tank installation or certification documents,
  - f) how long was the waste accumulated on-site,
  - g) copies of weekly or daily inspection logs of accumulation units,
  - h) copy of construction and design drawings for the units.
4. Provide the following information for each waste stream(s) generated during each boiler cleaning event described in 2 above:
  - a) describe type of treatment(s) conducted on the waste,
  - b) describe waste treatment units (include a copy of the construction and design drawings for the units),
  - c) duration of the waste treatment,

- d) copies of TCLP results of the waste after treatment,
  - e) describe final disposal of the waste,
  - f) copies of logs of burning of the waste,
  - g) copies of LDRs for the disposed waste,
  - h) copies of manifest for off-site disposal.
5. Do you contend that the waste streams generated from the combustion cleaning unit clean-out or your storage and treatment on-site is exempt from regulation under RCRA or does not require a RCRA permit? Provide a detailed explanation for your response. Include documentation related to your response.
6. Provide the following certification signed and dated by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all the relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

**SENDER: COMPLETE THIS SECTION**

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Conesville Generating Station  
47201 CR 273  
Conesville, Ohio 43811

2.

7001 0320 0006 1468 2264

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

WILLIAM C. PHILLBAUM

B. Date of Delivery

2-11-11

C. Signature

X

William C. Phillbaum

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

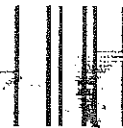
☒ Certified Mail☐ Express Mail☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE

ZANESVILLE OH 437



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

11 FEB 2011 PM 1 L

• Sender: Please print your name, address, and ZIP+4 in this box •

Demick Sammaranski

USEPA (LR-85)

71 W Jackson Blvd

Chicago, IL 60604

**RECEIVED**  
DIVISION FRONT OFFICE  
FEB 17 2011

LAND AND CHEMICALS DIVISION  
U.S. EPA - REGION 5

